Cas	e 2:24-bk-17820-BB Doc 23 Filed 09/ Main Document	30/24 Entered 09/30/24 13:59:57 Desc Page 1 of 8	
1	JEFFREY S. SHINBROT, ESQ. (SBN 155486) jeffrey@shinbrotfirm.com JEFFREY S. SHINBROT, APLC		
2			
3	15260 Ventura Blvd., Suite 1200 Sherman Oaks, CA 91403		
4	Telephone: (310) 659-5444 Fax: (310) 878-8304 Proposed Reorganization Counsel for Debtor-In-Possession		
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6			
7	UNITED STATES BANKRUPTCY COURT		
8	CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION		
9	In re	Case Number: 2:24-bk-17820-BB	
10		Chapter 11	
11	SKYLOCK INDUSTRIES, a	SUPPLEMENTAL DECLARATION	
12	California corporation	IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR	
13		ORDER AUTHORIZING DEBTOR TO PAY PRE-PETITION NON-	
14	Chapter 11 Debtor and Debtor-In-Possession	INSIDER EMPLOYEE WAGES & BENEFITS	
15		Date: October 1, 2024	
16		Time: 10:00 a.m.	
17		Place: 255 East Temple Street, Courtroom 1539	
18		Los Angeles, CA90012	
19		J	
20		TED STATES BANKRUPTCY JUDGE AND	
21	TO ALL PARTIES ON THE ANNEXED SERVICE LIST: COMES NOW		
22	SKYLOCK INDUSTRIES, the debtor and debtor-in-possession in the above entitled		
23	Chapter 11 proceeding and submits the annexed supplemental declaration of Jeffrey B.		
24	Crevoiserat in support of the Debtor's request for an Order Authorizing the Debtor to pay		
25	any non-insider employee wages or benefits that existed in the Petition date and related		
26	tax payments for the pre-Petition period filed at ECF Dkt. No. 5.		
27	WHEREFORE, the Debtor prays that the Court enter an order granting the relief		
28	requested above, and such additional relief as the Court deems just and proper.		

- 1. I am over the age of eighteen and I am the Chairman of the Board of Directors and the Chief Financial Officer of Skylock Industries (the "Debtor"). As to the following facts, I know them of my own personal knowledge, except where stated on information and belief, and if called as a witness, I could and would testify as set forth herein. I am one of the custodians of the books and records of the Debtor and I have gained knowledge of such records which were made at or about the time of the events recorded, and which were maintained in the ordinary course of the Debtor's business at or near the time of such acts, conditions or events to which they relate, any such document was prepared in the ordinary course of the business of the Debtor by a person who had personal knowledge of the event being recorded and had or has a business duty to record accurately such event.
- 2. On September 26, 2024 ("Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code ("Bankruptcy Code").
- 3. The Debtor's upcoming payroll will be for the work dates September 22, 2024, through September 28, 2024 and therefore will include four pre-Petition Date payroll days. This payroll will not include any insiders and there is sufficient cash to make the payroll (the cash on hand includes \$28,699 received by the Debtor today).
- 4. Since there are only four pre-Petition workdays on the upcoming payroll, payment for the pre-Petition amounts will be in the range of a few hundred dollars per employee and will not come anywhere close to the \$15,150 amount entitled to priority under the bankruptcy code.

I declare penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 30, 2024 Key Biscayne, Florida.

Jeffrey B. Crevoiserat

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

15260 Ventura Blvd., Suite 1200 Sherman Oaks, CA 91403

A true and correct copy of the foregoing document entitled (specify): SUPPLEMENTAL DECLARATION IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER AUTHORIZING DEBTOR TO PAY PRE-PETITION NON-INSIDER EMPLOYEE WAGES & BENEFITS

: will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below.

- X 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 9/30/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
  - **Misty A Perry Isaacson** misty@ppilawyers.com, ecf@ppilawyers.com;pagterandperryisaacson@jubileebk.net
  - David Samuel Shevitz David.S.Shevitz@usdoj.gov
  - Jeffrey S Shinbrot jeffrey@shinbrotfirm.com, sandra@shinbrotfirm.com;tanya@shinbrotfirm.com
  - Rachel P Stoian stoian.rachel@dorsey.com, stell.laura@dorsey.com
  - United States Trustee (LA) ustpregion 16.la.ecf@usdoj.gov

X <u>SERVED BY UNITED STATES MAIL</u>: On (*date*) 9/30/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge <u>will be completed</u> no later than 24 hours after the document is filed.

X additional service list attached

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/30/2024	Sandra Rodriguez	/s/Sandra Rodriguez
Date	Printed Name	Signature

## Top 20 Unsecured Creditors

Abrasive Finishing Company 14920 South Main Street Gardena, CA 9024 Email: quotes@afco.la

Accurate Bushing Co., Inc., 443 North Avenue Garwood, NJ 07277

Aircraft X-Ray Laboratorie Inc. 5216 PACIFIC BLVD, Huntington Park, CA 90255

Blue Sky Industries c/o FDH AERO LLC, 201 East John Carpenter Freeway Mandalay Tower 3, Suite 700 Irving, TX 75062 Ross Wyche, Credit Manager Email: Ross.Wyche@fdhaero.com

Consolidated Industries Inc., 677 Mixville Road Cheshire, CT 06410

Don Redmon 13246 W. Cameridge Ave Goodyear, AZ 85395-2118

Federal Express PO Box 7221 Pasadena, CA 91109-8321 310-563-4042

General Alrcraf Company 321 Kinetic Drive Oxnard, CA 93030 accounting@gen eralaircraft.com

Health Net Insurance

File # 52617 Los Angeles, CA 90074-2617

Los Angeles County Tax Collector PO Box 54018 Los Angeles, CA 90054-0018

Multitect CNC 38588 Lion Way Palmdale, CA 93551 multitechcncservice@yahoo.com

ND Testing, Inc., 11473 Pacific Avenue Fontana, CA 92337

Plymouth Tube Company-Corporate Headquarters 29W150 Warrenville Rd. Warrenville, IL 6055 sales@plymouth.com

Pro Centur Insurance PO Box 30002 Tampa, FL 33630-3002

Service Steel Aerospace 7925 Crossway Drive Pico Rivera, CA 90660

Corporate office 4609 70<sup>th</sup> Avene E Fife, WA 98424

Sierra Alloys Co. 5467 Ayon Avenue Irwindale, CA 91706 info@sierraalloys.com

Specline 2230 Mouton Dive Carson City, NV 89706 Supra Alloys c/o Castle Metals 1420 Kensington Rd Ste. 220 Oak Brook, IL 60523

Titanium Industries 4113 Solutions Center Chicago, IL 60677 973 Titanium Industries

Corporate Headquarters Rockaway, NJ – Sales and Service Center 18 Green Pond Road Rockaway, NJ 07866 Email: sales@titanium.com

Wencor, LLC Corporate Headquarters 416 Dividend Drive Peachtree City, GA 30269 sales@wencor.com

Spirit Aerosystems, Inc. PO Box 2978 Wichita, KS 67201 Email MRO@spiritaero.com

## **Secured Creditors**

Mitsubishi HC Capital America 800 Connecticut Avenue Norwalk, CT 06854

Pasadena Private Finance LLC Rachel Stoian, Esquire Dorsey Whitney, LLP 167 Hamilton Avenue Ste. 200 Palo Alto, CA 94301 Email: Stoian.Rachel@dorsey.com

Sumitomo Mitsui Banking 601 S. Figueroa St., # 1800 Los Angeles, CA 90017 US Small Business Administration Elan S. Levey, Assistant United States Attorney United States Attorney's Office 300 N. Los Angeles St., Rm. 7516 Los Angeles, CA 90012 Email: elan.levey@usdoj.gov

Darin St. Ivany 441 32nd Street Manhattan Beach, CA 90266